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August 7, 2013

BY EMAIL

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Honorable Paul A. Crotty
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

8-8-13
✓ SO ORDERED:

Paul A. Crotty
HON. PAULA A. CROTTY
UNITED STATES DISTRICT JUDGE

Re: Universal Trading & Investment Co., Inc. v.
Tymoshenko, et al., 11-cv-7877 (PAC) – Defendant
Andrey Vavilov's Request for Extension of Time

Dear Judge Crotty:

This firm and Matthew Feser of Salisbury & Ryan represent defendant Andrey Vavilov. Enclosed is a courtesy copy of the Entry of Special Appearance which was filed electronically with the Court today. This entry of appearance is a special appearance and is not a consent to jurisdiction or a waiver of the right to challenge the assertion of jurisdiction.

✓ In accordance with Your Honor's Individual Practices, Rule #1 E, we are writing to request a thirty-day extension of time for defendant Andrey Vavilov to answer, move, or otherwise plead in response to the amended complaint, until Monday, September 9, 2013. The original due date is August 8, 2013.

This request is defendant Andrey Vavilov's first request for an extension of time to answer, move or otherwise plead and is for not more than 30 days.

MEMO ENCLOSED

Honorable Paul A. Crotty
August 7, 2013
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Plaintiff's counsel consents to this extension until
September 9, 2013.

In accordance with Individual Practice Rule #1 E(5),
plaintiff's counsel and counsel for Mr. Vavilov are available at
Your Honor's convenience for a conference on August 8, 9, and
12.

Respectfully,


JANE C. SILVER

JCS:st
Enclosure

cc: George Lambert, Esquire
Peter A. Joseph, Esquire
Kenneth F. McCallion, Esquire
Matthew P. Feser, Esquire
James P. Golden, Esquire
(all by email w/enclosure)

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

UNIVERSAL TRADING & INVESTMENT	:	
CO., INC.	:	
	:	
	:	
V.	:	CIVIL ACTION
	:	NO. 11-CV-7877 (PAC)
YULIA TYMOSHENKO	:	
ALEXANDER TYMOSHENKO	:	
ANDREY VAVILOV	:	
	:	
and DOES from 1 to 10	:	

ENTRY OF SPECIAL APPEARANCE

Please enter our special appearance as co-counsel on behalf of defendant Andrey Vavilov. This entry of appearance is a special appearance and is not a consent to jurisdiction or a waiver of the right to challenge the assertion of jurisdiction.

/s/ Matthew P. Feser
Matthew P. FESER
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(Admission Pro hac vice pending)

Date: August 7, 2013

Attorneys for defendant
Andrey Vavilov

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CERTIFICATE OF SERVICE

I, James P. Golden, hereby certify that the foregoing Entry of Special Appearance has been filed electronically and is now available for viewing and downloading from the Court's Electronic Case Filing System. I further certify that a copy of the foregoing Entry of Special Appearance was served by regular mail on August 7, 2013, on the following:

Attorneys for Plaintiff:

Peter A. Joseph, Esq.
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George Lambert, Esq.
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Attorney for Defendant, Yulia Tymoshenko:

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/s/ James P. Golden
JAMES P. GOLDEN

Date: August 7, 2013